

TROY LAW, PLLC

ATTORNEYS / COUNSELORS AT LAW

Tel: (718) 762-1324 troylaw@troypllc.com Fax: (718) 762-1342

41-25 Kissena Boulevard, Suite 103, Flushing, NY 11355

June 16, 2021

Via ECF

Hon. Rachel P. Kovner, U.S.D.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

**Re: Motion to Stay Title VII claims in Lieu of Dismissal Pending Plaintiff's
Receipt of Re-Issued Right to Sue and Concurrent Order for Equal
Employment Opportunity Commission to Reopen the Investigation
1:19-cv-5458 (RPK) (JO) Stidhum v. 161-10 Hillside Auto Ave., LLC, et al.**

Your Honor,

This office represents the Plaintiff in the above-referenced matter. We write to respectfully request the Court to, in lieu of dismissing Plaintiff's combined federal and state pregnancy and sex discrimination claims, to allow for a stay with the respect to Plaintiff's Title VII claims and to issue an order for the Equal Employment Opportunity Commission (EEOC) to reopen the charge and continue the investigation into the alleged activity of Defendant HILLSIDE AUTO AVE, LLC, HILLSIDE AUTO MALL INC, ISHAQUE THANWALLA, and RONALD M. BARON until the 180 day has elapsed. Upon receipt of the new, re-issued Right to Sue letter after the elapse of at least 89 days of EEOC investigation (we received the Right to Sue letter 91 days after the initial charge) we will file the re-issued Right to Sue Letter so as to lift the stay of the case with respect of the Title VII claims.

With respect to state and city human rights law claims, that should not be affected by the stay, and those claims should continue notwithstanding the stay as to the Title VII claims.

We thank your Honor for your kind attention to this matter.

Respectfully submitted,
TROY LAW, PLLC

/s/ John Troy

John Troy, Esq.

Attorney for Plaintiffs

JT/AOC

cc: via ECF
all counsel of record